
HOWARD CONSULTING PTY LTD

ABN 79 126 290 444

PUBLIC RECORD VERSION

April 27, 2012

Mr G Gleeson
Director
International Trade Remedies Branch
Australian Customs & Border Protection Services
Canberra ACT 2600

Dear Mr Gleeson

**Re: SEF No. 177
A/C Alpine Pipe Manufacturing SDN BHD (Alpine)**

Alpine welcomes the prospect outlined in para 3.5 on page 18 of SEF No. 177 relating to the identification of any clearly identifiable subsets of imported HSS.

Specifically 'Alpine' would like to refer to para 3.5.2 on "thickness and cross sectional size" for purposes of clarifying what the SEF states have been inconsistent claims on what the applicant factually can and does produce.

To further explain claims on what the applicant can actually produce in terms of directly competitive goods to the imported goods 'Alpine' submits the following based on what 'Alpine' and other industry and market participants clearly understand of Onesteel-ATM's production capability for RHS – SHS:

- Onesteel-ATM has the capability to produce RHS-SHS in a thickness of up to 8mm but only for Grade 250 HRC being the non-structural Grade, but for any thickness exceeding 6mm up to 8mm it is at the very limit of its production capability.
- Onesteel-ATM does not have the production capability to produce RHS-SHS in any thickness exceeding 8mm, being most notably 9mm and above, in any Grade of HRC but especially for the structural Grades of HRC, 350, 450. it effectively is limited to thicknesses up to 6mm.

The critical and relevant fact on Onesteel-ATM's production capability is that it cannot produce RHS-SHS in any thickness of 9mm and above.

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M.J. Howard

Email: mjh@howardconsulting.com.au

'Alpine' is understood to be the only verified exporter capable of producing and supplying RHS-SHS of a thickness of 9mm and above and submits that their thicknesses of 9mm and above do not directly compete with any RHS-SHS produced by Onesteel-ATM.

'Alpine' further submits that Customs and Border Protection should, in its consideration of this issue, insist on the applicant responding with a precise answer to the specific question of "does it have the capability to produce RHS-SHS with a thickness of 9mm or greater?"

'Alpine' thanks Customs and Border Protection for its consideration of this issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'M J Howard', written in a cursive style.

M J Howard
Representative